



COMMONWEALTH of VIRGINIA

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20 August 2008

Ms Leanna Hush O'Donnell
Fairfax County Department of Planning & Zoning
12055 Government Center Parkway, Suite 730
Fairfax, Virginia 22035-5505

RE: Laurel Hill House—Historic Structure Report and Treatment Options
Lorton, Fairfax County
VDHR File No. 1998-1786

Dear Ms O'Donnell:

We have received the Historic Structures Report and Treatment Options for the Laurel Hill House located at the former Lorton Correction Center in Fairfax County. The report was prepared by Frazier Associates for the County in order to explore treatment options for the dwelling. The Laurel Hill House, originally constructed circa 1787 with substantial later modifications, is a contributing resource in the National Register of Historic Places-listed District of Columbia Workhouse and Reformatory Historic District.

The subject report investigates three treatment options for the Laurel Hill House. Option 1 is to restore the dwelling to its eighteenth century appearance with either a new addition or a separate adjacent structure in order to accommodate new uses within the footprint of the earlier additions. Option 2 is to rehabilitate the house for a new use utilizing its current configuration to the greatest extent possible. Option 3 is to selectively demolish the building down to its foundations, and to interpret the site as was done by Fairfax County at its Mt. Air property.

As an historic property that contributes to a larger National Register historic district, it is important that any treatment proposed by the County for the Laurel Hill House adhere to the

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guidance expressed by the National Park Service in *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Please see our comments below on each of the proposed treatment options.

Option 1

As defined in the *Standards*, restoration is “the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by the means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period.” Restoration is an accepted treatment possibility for which the NPS has created a particular set of standards for use to guide the responsible proponent exercising this option to ensure that historic materials, design, and workmanship are protected to the greatest extent possible. The restoration standards also help to guard against creating a false sense of historicism by relying on strong physical and documentary evidence to replicate lost design elements and the building’s sought after period appearance. As expressed in Standard 7: “Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.”

The obstacles to restoring the Laurel Hill House are clearly addressed in the Frazier report. In the “Comparative Analysis” section for Option 1 found on page 51, the conclusion that “little original historic fabric remains on which to base restoration” and that “the result largely will be a conjectural reconstruction that is not recommended by professional standards and guidelines” are an unmistakable indictment of this treatment approach. Even if after additional costly research and study into the dwelling’s original configuration the house could be restored to its circa 1787 appearance, its uses to the County would seem to be limited to a house museum or interpretive artifact. We recommend against Option 1 as we do not believe that it can be accomplished according to the *Standards*.

Option 2

From an historic preservation perspective Option 2 is the most appropriate. This option takes into account the existing historic fabric, including the those elements that are not original to the eighteenth century house but have due to their age acquired importance in their own right. Rehabilitation would be the treatment approach that would most likely conform to the *Standards* and ensure that the Laurel Hill House is still a contributing resource in the historic district once the work is complete. It would also seem that rehabilitation would provide the County with more flexibility as to a new use for the building.

Option 3

This is the least desirable of the three options as it guarantees that the Laurel Hill House will no longer be considered an historic property. Although the County utilized a similar approach with Mt. Air, this was only after the dwelling was destroyed by fire and its historic integrity was already lost. Demolishing the Laurel Hill House to interpret what was once there is contrary to accepted preservation practice and logic. It would constitute an overt adverse effect that would violate the terms and spirit of the existing Programmatic Agreement.

We hope that our comments are helpful to the County in its planning and we look forward to further consultation.

If you have any questions about our comments, please contact me at (804) 367-2323, Ext. 114.

Sincerely,

A handwritten signature in dark ink, appearing to read "Marc Holma", written in a cursive style.

Marc Holma, Manager
Office of Review and Compliance

C: Ms. Linda Blank, Fairfax County